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**To:** All Interfacility Wheelchair Transportation Agencies  
**From:** David E. Cullen, Jr., Enforcement & Compliance Manager  
**Subject:** Requirements for Licensure Concerning Motor Vehicle Registration

The Office of EMS (OEMS) has received clarification from the Department of Motor Vehicles (DMV) concerning license plate requirements for EMS vehicles in Virginia. The clarification affects all Interfacility Wheelchair Transportation vehicles permitted by OEMS.

Under Title 46.2, Chapter 6 of the *Code of Virginia*, all vehicles operating on any highway in the Commonwealth must be registered. License plates are issued for each registered vehicle. The license plates are designated in accordance with the vehicle's purpose classification. Pursuant to the definitions set out in Virginia Code section 46.1-100, the purpose classification "operation or use of a vehicle for rent or for hire, for the transportation of passengers" is met when the owner or operator of the motor vehicle operating over the highways in the Commonwealth accepts or receives compensation for the service, directly or indirectly. Thus, wheelchair-bound passenger transportation vehicles, permitted as Wheelchair Interfacility Transport EMS vehicles by the Office of EMS, are "for hire" vehicles under DMV's statutes and must display the appropriate "H" series of plates.

The *EMS Regulations* require licensed EMS agencies to comply with all applicable Virginia Motor Vehicle Codes. This means, vehicles operated by agencies licensed to provide Interfacility Wheelchair Transportation Services must be properly registered and plated by DMV (12 VAC 5-31-2020.A).

The Office of EMS requires all Wheelchair Interfacility Transportation vehicles to display "H" series plates as a condition of licensure. "H" plates must be displayed on wheelchair transportation vehicles holding EMS Vehicle Permits. The Office of EMS will enforce this requirement during the inspection process. If you have additional questions, please contact your area EMS Program Representative or David Cullen, Enforcement & Compliance Manager with the Office of EMS at 1-800-523-6019 or [dcullen@vdh.state.va.us](mailto:dcullen@vdh.state.va.us).